

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA

V.

ALEJANDRO RICHARD  
VELASQUEZ GOMEZ

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CAUSE NO. SA-22-CR-461-JKP

DEFENDANT’S UNOPPOSED MOTION TO CONTINUE

TO THE HONORABLE JASON K. PULLIAM, UNITED STATES DISTRICT JUDGE FOR  
THE WESTERN DISTRICT OF TEXAS:

Defendant, Alejandro Richard Velasquez Gomez, requests a continuance of his trial  
setting and all corresponding deadlines. In support, he states the following:

I.

Velasquez is scheduled to appear before this Court for jury selection and trial on  
Tuesday, January 17, 2023.

II.

Defense counsel respectfully moves to continue the *Ellis* deadline, jury selection and trial  
setting, and all deadlines corresponding. The discovery in this case is extensive and additional time  
is needed to review. It would also allow the parties time to engage in good-faith negotiations.  
Accordingly, Velasquez respectfully requests a seventy (70) day continuance.

III.

Counsel for the Government Assistant United States Attorney William Franklin Lewis, Jr.,  
is unopposed to the continuance requested.

IV.

Velasquez acknowledges that any continuance granted in this cause is excludable under the Speedy Trial Act as delay resulting from a continuance granted at the request of defense counsel because the ends of justice served by the continuance outweigh the interest of the public in a Speedy Trial. 18 U.S.C. § 3161(h)(7)(A). Velasquez does not waive any rights under the Sixth Amendment.

CONCLUSION

Defendant respectfully requests that this Honorable Court will continue the above-styled and numbered cause for seventy (70) days.

Respectfully submitted.

MAUREEN SCOTT FRANCO  
Federal Public Defender

/s/ MOLLY LIZBETH ROTH  
Assistant Federal Public Defender  
Western District of Texas  
727 East César E. Chávez Blvd., B-207  
San Antonio, Texas 78206-1205  
(210) 472-6700  
(210) 472-4454 (Fax)  
State Bar Number: 24040140

*Attorney for Defendant*

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of January, 2023, I electronically filed the foregoing Defendant's First Unopposed Motion to Continue with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Kelly Griffith Stephenson  
William Franklin Lewis. Jr.  
Assistants to the United States Attorney  
601 N. W. Loop 410, Suite 600  
San Antonio, Texas 78216

/s/ MOLLY LIZBETH ROTH  
*Attorney for Defendant*

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ORDER

On this day the Court considered Defendant's Unopposed Motion to Continue jury selection, trial, and relevant deadlines. Having considered the basis for the request and the Government's non-opposition to it, the Court finds it to be well-taken and GRANTS Defendant's continuance motion.

Any continuance granted in this cause is excludable under the Speedy Trial Act as delay resulting from a continuance granted at the request of Defendant's counsel because the ends of justice served by the continuance outweigh the interest of the public in a Speedy Trial. 18 U.S.C. § 3161(h)(7)(A).

SO ORDERED on this the \_\_\_\_\_ day of January 2023.

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Jason K. Pulliam  
United States District Judge